

**UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In Re:

JOHN C ROBINSON

Debtor(s)

Case No. 1:22-bk-01109

Chapter 7

Honorable Carol A. Doyle

NOTICE OF MOTION

To: *Service list affixed*

PLEASE TAKE NOTICE that on July 14, 2022 at 10:00 AM, I will appear before the Honorable Carol A. Doyle, or any Judge sitting in that Judge's place, and present **DEBTOR'S MOTION TO REOPEN CHAPTER 7 CASE**, a copy of which is attached.

This motion will be presented and heard electronically using Zoom for Government. No personal appearance in court is necessary or permitted. To appear and be heard on the motion, you must do the following:

To appear by video, use this link: <https://www.zoomgov.com/>. Then enter the meeting ID and password.

To appear by telephone, call Zoom for Government at 1-669-254-5252 or 1-646-828-7666. Then enter the meeting ID and password.

Meeting ID and password. The meeting ID for this hearing is **161 155 8289** and the password is **Doyle742**. The meeting ID and password can also be found on the judge's page on the court's web site.

If you object to this motion and want it called on the presentment date above, you must file a Notice of Objection no later than two (2) business days before that date. If a Notice of Objection is timely filed, the Motion will be called on the presentment date. If no Notice of Objection is timely filed, the court may grant the motion in advance without a hearing.

PATRICIA DAYNE BROWN

By: /s/ Joseph S. Davidson

Joseph S. Davidson
LAW OFFICES OF JOSEPH P. DOYLE LLC

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CERTIFICATE OF SERVICE

I, Joseph S. Davidson, certify that I caused a copy of this notice and motion to be served, via electronic case filing to Miriam R. Stein, Chapter 7 Trustee and via United States First Class Mail® to the attached service list on June 8, 2022 before the hour of 5:00 p.m. from the office located at 105 S Roselle Rd, Suite 203, Schaumburg, IL 60193.

/s/ Joseph S. Davidson

Label Matrix for local noticing
0752-1
Case 22-01109
Northern District of Illinois
Eastern Division
Wed Jun 8 15:14:07 CDT 2022

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

U.S. Bankruptcy Court
Eastern Division
219 S Dearborn
7th Floor
Chicago, IL 60604-1702

Advocate Health Care
3075 Highland Parkway
Downers Grove, IL 60515-5560

Alden Des Plaines
4200 W. Peterson Ave
Suite 140
Chicago, IL 60646-6819

(p)ALLIANCE COLLECTION AGENCIES INC
ATTN CLIENT SERVICES DEPARTMENT
3916 S BUSINESS PARK AVE
MARSHFIELD WI 54449-9029

Best Practices Inpatient Care
P.O. Box 268
Lake Zurich, IL 60047-0268

Citibank/Best Buy
Citicorp Credit Svcs/Centralized Bk dept
Po Box 790034
St Louis, MO 63179-0034

Cook County Clerk's Office
118 N. Clark Street, Room 434
Chicago, IL 60602-1413

Discover Financial
Attn: Bankruptcy
Po Box 3025
New Albany, OH 43054-3025

(p)PNC BANK RETAIL LENDING
P O BOX 94982
CLEVELAND OH 44101-4982

Synchrony Car Care
Attn: Bankruptcy
Po Box 965064
Orlando, FL 32896-5064

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

John C Robinson
47 N. 5th Avenue
Des Plaines, IL 60016-2301

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105 S Roselle Road
Suite 203
Schaumburg, IL 60193-1631

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Gutnicki LLP
4711 Golf Road
Suite 200
Skokie, IL 60076-1236

Patrick S Layng
Office of the U.S. Trustee, Region 11
219 S Dearborn St
Room 873
Chicago, IL 60604-2027

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g)(4).

Alliance Collection Agencies
Attn: Bankruptcy
Po Box 1267
Marshfield, WI 54449

PNC Bank
PO Box 3429
Pittsburgh, PA 15230

End of Label Matrix
Mailable recipients 16
Bypassed recipients 0
Total 16

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JOHN C ROBINSON

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Case No. 1:22-bk-01109

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DEBTOR'S MOTION TO REOPEN CHAPTER 7 CASE

NOW COMES JOHN C ROBINSON (“Debtor”), through undersigned counsel, pursuant to 11 U.S.C. § 350(b) and Fed. R. Bankr. P. 5010, requesting the Court enter an order reopening Debtor's Chapter 7 case to seek an Order of Civil Contempt against Alden–Des Plaines Rehabilitation and Health Care Center, Inc. (“Alden Des Plaines”) for violation of the discharge injunction. In support thereof, Debtor states as follows:

1. On January 31, 2022, Debtor filed a voluntary petition for relief under Chapter 7, Title 11, United States Code.
2. On May 3, 2022, an Order of Discharge under 11 U.S.C. § 727 was granted to Debtor.
3. The trustee appointed in the case discovered no assets and filed a report so stating.
4. The Court approved that report, discharged the trustee, and the case was closed on May 6, 2022.
5. Notwithstanding Debtor’s bankruptcy discharge, Alden Des Plaines continues to send statement(s) to Debtor—seeking to collect Debtor’s pre-petition, discharged debt.

WHEREFORE, Debtor requests that the Court enter an order reopening his Chapter 7 case pursuant to 11 U.S.C. § 350(b) and Fed. R. Bankr. P. 5010 for the limited purpose of seeking

an order of civil contempt against Alden Des Plaines. for violating the discharge injunction; and granting such other relief as the Court deems just and proper.

DATED: June 8, 2022

Respectfully submitted,

JOHN C ROBINSON

By: /s/ Joseph S. Davidson

Joseph S. Davidson
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